

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

GEOTAG, INC.

Plaintiff,

v.

GEORGIO ARMANI S.P.A., ET AL.

Defendants,

Civil Action No. 2:10-cv-569

TJW

**PLAINTIFF'S ANSWER TO COUNTERCLAIMS OF  
KNOW-WHERE SYSTEMS, INC.**

Plaintiff GEOTAG, INC. ("Geotag") answers Defendant KNOW-WHERE SYSTEMS, INC.'s ("Defendant") "Answer, Affirmative Defenses, and Counterclaims to Plaintiff's Complaint for Patent Infringement" (docket number 37) by corresponding paragraph number as follows:

1. Admitted as to place of incorporation and place of business.
2. Admitted as to place of incorporation and place of business.
3. Admitted that Defendant purports to assert counterclaims under the Federal Declaratory Judgment Act. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.
4. Admitted as to personal jurisdiction.
5. Geotag reasserts its responses to paragraphs 1 to 4.
6. Admitted as to a controversy for purposes of subject matter jurisdiction over Defendant's counterclaims concerning infringement. Denied as to merits of counterclaims.

7. Admitted that Defendant requests a declaration that it has not infringed any valid and enforceable claim of the patent. Denied that Defendant is entitled to any such relief. Denied as to merits of counterclaims.

8. Geotag reasserts its responses to paragraphs 1 to 7.

9. Admitted as to a controversy for purposes of subject matter jurisdiction over Defendant's counterclaims concerning invalidity. Denied as to merits of counterclaims.

10. Admitted that Defendant requests a declaration that the patent is invalid. Denied that Defendant is entitled to any such relief. Denied as to merits of counterclaims.

11. Denied.

12. To the extent necessary, Geotag denies that Defendant is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, Geotag generally denies any allegations in the counterclaims not specifically admitted above, and Geotag realleges infringement, validity and damages, and denies any allegations in the counterclaims adverse to same.

#### PRAAYER FOR RELIEF

WHEREFORE, Geotag respectfully requests that this Court enter judgment denying and dismissing Defendant's counterclaims, and that the Court enter judgment in favor of Geotag as requested in Geotag's complaint, as amended or supplemented.

May 11, 2011

Respectfully submitted,

COOPER & VAN CLEEF, PLLC

By: /s/ Charles van Cleef

Charles van Cleef

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ATTORNEYS FOR PLAINTIFF

GEOTAG, INC.

#### CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

May 11, 2011

/s/ Charles van Cleef  
Charles van Cleef